



Filing Receipt

Received - 2021-09-16 02:45:26 PM

Control Number - 51840

ItemNumber - 90

PROJECT NO. 51840

RULEMAKING ESTABLISHING	§	PUBLIC UTILITY COMMISSION
ELECTRIC WEATHERIZATION	§	
STANDARDS	§	OF TEXAS

**NEXTERA ENERGY RESOURCES, LLC’S COMMENTS ON NEW 16 TAC § 25.55 AS
APPROVED AT THE AUGUST 26, 2021 WORK SESSION**

NextEra Energy Resources, LLC (“NextEra”) submits these comments in response to the new 16 Texas Administrative Code §25.55. NextEra has filed comments throughout this project and refers to those comments by reference here for background on NextEra and its generation assets.¹

The proposed rule, which encompasses the first phase of weatherization planning for the Electric Reliability Council of Texas (“ERCOT”) region, provides a sound framework within which generators can implement a consistent level of preparation for the upcoming winter, thereby improving the reliability of the electric system during extreme weather conditions.

NextEra supports the proposed rule but believes it would benefit from additional certainty regarding the operational limits that design criteria impose on generator operations. Section 25.55(c)(1)(E) requires generation entities to determine minimum design temperature, minimum operating temperature, and other operating limitations based on temperature, precipitation, humidity, wind speed, and wind direction, however the proposed rule does not incorporate or otherwise acknowledge these design limits when setting emergency preparedness reliability standards for generation entities. NextEra respectfully suggests generator design limits be acknowledged in the weather emergency preparedness reliability standards for generation entities by including the following changes to proposed § 25.55(c)(1)(A):

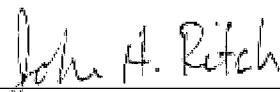
¹ 51840 Initial Comments of NextEra Energy Resources, LLC (Jun. 23, 2021), Errata to NextEra Initial Comments (Jun. 23, 2021) and, 51840 NextEra Comments to Commission Staff’s Discussion Draft (Jul. 30, 2021).

(A) All preparations necessary to ensure the sustained operation of all cold weather critical components at the respective generation resource's cold weather design ratings during winter weather conditions, such as chemicals, auxiliary fuels, and other materials, and personnel required to operate the resource;

NextEra believes this modification is necessary to clarify that the proposed rule does not create an obligation on the part of generation entities to operate generation resources outside their design parameters and potentially void manufacturer warranties, damage equipment, or create unsafe operating conditions.

NextEra looks forward to participating in Phase II of the weather reliability standards after the completion of ERCOT's weather study. Phase II will provide a valuable opportunity for additional reliability improvements with input from generation entities based their experience operating under a broader range of weather conditions.

Respectfully submitted,


NEXTERA ENERGY RESOURCES

John H. Ritch
Sr. Director Regulatory and Legislative Affairs
NextEra Energy Resources
20455 SH 249, Suite 200
Houston, TX 77070
Office: (713) 401-5738
Cell: (713) 823-0915
Facsimile: (713) 401-5842
e-mail: John.ritch@nee.com


COFFIN RENNER LLP

Ann M. Coffin
State Bar No. 00787941
Wendy K. L. Harvel
State Bar No. 00796719
1011 W. 31st Street
Austin, Texas 78705
Office: (512) 879-0900
Facsimile: (512) 879-0912
e-mail: ann.coffin@crtxlaw.com
e-mail: wendy.harvel@crtxlaw.com

ATTORNEYS FOR NEXTERA ENERGY RESOURCES